## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA SOUTHERN DIVISION

Case No. 7:14-cv-2-BR

MARIAN SNOW,	)
Plaintiff,	) ) )
v.	) ) EMERGENCY MOTION FOR
WELLS FARGO BANK, N.A., and WELLS FARGO HOME MORTGAGE,	) PROTECTIVE ORDER ) )
Defendant.	) )

Defendants Wells Fargo Bank, N.A., and Wells Fargo Home Mortgage (collectively, "Wells Fargo"), pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, move for an order requiring Plaintiff Marian Snow to take the deposition of Wells Fargo's designated representative in *North Carolina* on November 25, 2014, instead of in *Iowa*. Wells Fargo has attempted in good faith to resolve the issue with Plaintiff without court action, but those efforts have been unsuccessful. A true and accurate copy of Plaintiff's Third Notice of Deposition and Request to Produce is attached to Wells Fargo's contemporaneously filed memorandum of law as **Exhibit B**.

Wells Fargo also moves pursuant to Rule 37(a)(5)(a) for an order requiring Plaintiff to pay the reasonable expenses and attorney's fees it incurred in making this motion. An accompanying supporting memorandum of law is filed contemporaneously with this motion.

This the 12th day of November, 2014.

## WOMBLE CARLYLE SANDRIDGE & RICE

A Limited Liability Partnership

/s/ Amanda G. Ray

Amanda G. Ray, NCSB # 37010

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Counsel for Wells Fargo Bank, N.A. and Wells Fargo Home Mortgage

## **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **EMERGENCY MOTION FOR PROTECTIVE ORDER** with the Clerk of Court using the CM/ECF system and I certify that I have served the Non-CM/ECF party to this action by mailing via U.S. Mail, postage prepaid, to:

Marian Snow 907 Timberlake Drive NW Wilson, NC 27893 Plaintiff, pro se

This the 12th day of November, 2014.

## WOMBLE CARLYLE SANDRIDGE & RICE

A Limited Liability Partnership

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